

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

**DISABLED PATRIOTS OF AMERICA, INC.,
a Florida Not-For-Profit Corporation, and
BONNIE KRAMER, Individually,**

Plaintiffs,

V.

**TOWN & COUNTRY CHICAGO
ASSOCIATES, LLC, A Foreign Limited
Liability Company,**

Defendant.

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: Case No.: 1:07-cv-06362
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: Joan H. Lefkow
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PLAINTIFFS' SECOND REQUEST OF ENTRY UPON LAND
FOR INSPECTION AND OTHER PURPOSES

COME NOW Plaintiffs Disabled Patriots of America, Inc. and Bonnie Kramer, by and through undersigned counsel, and pursuant to Rule 34 of the Federal Rules of Civil Procedure, request entry upon the Defendant's property known as Town And Country Center, 445 E. Palantine Rd., Arlington Heights, Illinois, for the purpose of inspecting and measuring, surveying, photographing, testing or sampling the property within the scope of Rule 26(b). The area of inspection shall be the following:

1. Any and all Parking Area(s) provided for use by the public, customers and invitees;
2. Any and all Restrooms, which are provided for use by the public, customers, and invitees;
3. Any and all entrances and Path(s) of Travel areas provided for public use;



4. All access(es) to goods and services throughout the facility; and
5. Any and all areas of the public accommodation, excepting only work areas used exclusively by employees, which include, but are not limited to, all accessible hotel rooms in the subject property, and all common areas of the public accommodation; and
6. All other areas cited in the Complaint as being in violation of the ADA.

The time for said entry shall be Thursday, May 29, 2008, at 12:30 p.m.. and shall continue until Plaintiffs' inspection shall have been completed. In the event the inspection of the property is not completed in one inspection, same shall be continued on a mutually agreeable time and date.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via email and U.S. Mail on this April 21, 2008, to:

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By: /s/ Thomas B. Bacon
Thomas B. Bacon, Esquire